

---

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

---

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT APPLIES TO:

Plaintiff's Master Administrative Long-Form  
Complaint and:

Plaintiff John Nix

**PETITION TO ESTABLISH**  
**ATTORNEY'S LIEN**

Comes now Petitioners, Attorney Robins Cloud, LLP, pursuant to an executed Agreement for Legal Services come now and states as follows:

1. Petitioners are attorneys at law admitted to practice before the courts of Texas, and file this Petition to establish a lien for attorney's fees as set forth hereinafter.
2. On or about September 18, 2015, Petitioners, Robins Cloud, LLP, was retained and employed by the Plaintiff, John Nix, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions, head, and brain injuries.
3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, client will not owe a legal fee. If Attorney Robins Cloud,

LLP, obtains a settlement or judgment for Client, Client will pay to the Petitioners thirty three and one third percent (33 1/3%) of the gross recovery plus reimbursement of expenses.

4. From the date the Petitioner was authorized to proceed on behalf of the Plaintiff, the Petitioner has actively and diligently investigated, prepared, and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communication with the client, preparation and review of client's factual and legal circumstances, retaining experts, drafting and providing client updates, analyzing Plaintiff's medical status and need for medical testing, etc.
5. The Plaintiff's discharged the Petitioners as his attorney in this matter, and has hired another attorney in this action.
6. Petitioners were not terminated due to any malfeasance or other improper action.
7. The Petitioners claim the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioners pray:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiff any sums of money until said lien has been satisfied; and
5. For such other further relief as this Court deems just.

Dated: September 18, 2017

Respectfully submitted,

Attorney Ian Cloud, Robins Cloud, LLP

By: \_\_\_\_\_

Ian P. Cloud  
State Bar No. 00783843  
Robins Cloud, LLP  
2000 West Loop South. 22<sup>nd</sup> Floor  
Houston, TX 77027  
Tel: (713) 650-1200  
Fax: (713) 650-1400  
[icloud@robinscloud.com](mailto:icloud@robinscloud.com)

**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, a copy of the foregoing Notice of Change of Firm Affiliation was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system as indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

Dated: September 18, 2017

\_\_\_\_\_  
Ian P. Cloud